

**IN THE UNITED STATES DISTRICT
COURT FOR THE SOUTHERN DISTRICT
OF OHIO EASTERN DIVISION**

MENG HUANG,

Plaintiff,

vs.

THE OHIO STATE UNIVERSITY and
GIORGIO RIZZONI,

Defendants.

Case No: 2:19-CV-1976

Hon. Judge: James L. Graham

Mag. Judge: Chelsey M. Vascura

JURY TRIAL DEMANDED

PLAINTIFF'S RESPONSE TO COUNSEL'S MOTION TO WITHDRAW

I, Plaintiff, Meng Huang, respond to my counsel's Motion to Withdraw (the "Motion") pursuant to Judge Graham's February 3, 2022 Order, as follows:

Honorable Judge Graham,

I was surprised when I received the Motion, as my counsel Obermayer and I had communicated in mid-December 2021 and agreed to seek new counsel for this case as a joint effort. Contrary to what Obermayer claimed in their affidavit, I have actively participated in communicating with one attorney referred by Obermayer since December 2021 and followed up through January 2022, but this attorney eventually didn't take the case. I have also followed Obermayer's suggestion and reached out to local counsel Joshua Engel's firm, but was informed by Mr. Engel that there must be some miscommunication and his firm was not in a position to take over the case as lead counsel. Apart from these two referrals, which I have already contacted, I have not received any other feedback from Obermayer on their search for potential new counsel for this case, prior to receiving the email notification of the filing of the Motion. I disagree with the suggestion that I have not been responsive to Obermayer's offer to help find new counsel. Up

to the time I saw the Motion, it was my belief that they were still working on seeking new counsel, and that they would not be filing the Motion as long as I cooperated in retaining new counsel.

I have dedicated a significant part of my life to this case during the past four years and I have supported Obermayer in their work since the very beginning. After communicating with Obermayer in mid-December 2021, I have been diligently seeking new counsel to take over the case. Just this past week, I have contacted more than a dozen attorneys, but all of them expressed unwillingness to take the case due to its current “procedural posture,” referring to the undecided summary judgement motion and the imminent trial date. These two issues are causing me extreme difficulty in retaining new counsel.

Therefore, I respectfully request some manner of the following relief, as the court deems appropriate and reasonable:

1. Permit Obermayer’s withdrawal only after the court issues a ruling on the summary judgement motion (preferably within 30 days), and grant a three-month trial continuance to help me obtain new counsel to prepare for trial or otherwise resolve the case.
2. Permit Obermayer’s withdrawal only after I have secured new counsel pursuant to the agreement I believed I had reached with them in mid-December 2021, and grant a trial continuance of no less than six months so that I am better able to find new counsel to represent me.

Respectfully submitted,

Dated: February 10, 2022

/s/ Meng Huang